

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO**

MELODY JOY CANTU AND DR. RODRIGO
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA AND DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

**NOTICE OF INTENT TO TAKE ORAL AND VIDEOTAPED DEPOSITION OF
J. DAVID APPLE.**

TO: **J. DAVID APPLE** c/o J. David Apple, Email: jdapple@applefinklaw.com; Apple & Fink, LLP, 735 Plaza Blvd., Suite 200, Coppel, Texas 75019.

Please take notice that pursuant to Federal Rule of Civil Procedure 30 and the Scheduling Order Dkt. 89, regarding the discovery period, Plaintiffs Melody Joy Cantu and Dr. Rodrigo Cantu, intent to take the oral and/or videotaped deposition of Defendant Digital Forensics Corporation, LLC's retained testifying expert, **J. DAVID APPLE**, before a notary public or some other officer authorized by law to administer oaths, at **6:00 p.m. on Tuesday, July 19, 2022**, by remote means via a videoconferencing platform.

The deposition, when taken, may continue from day to day until completed, and will be taken by stenographic means and videoconferencing examination with the answers to be used in the final trial of the above-styled and numbered cause. You are invited to have counsel present for purposes of cross-examination.

Dated: July 14, 2022

Stipulated and respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)
Pro Hac Vice
Tor Ekeland Law, PLLC
30 Wall Street, 8th Floor
New York, NY
t: (718) 737 - 7264
f: (718) 504 - 5417
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns
State Bar No. 24034581
Minns Law Firm, P.C.
d/b/a Rain Minns Law Firm
4412 Spicewood Springs Rd., Suite 500
Austin, Texas 78759-8583
Tel.: 512-372-3222
Fax: 512-861-2403
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu
and Dr. Rodrigo Cantu*